

From: Mccray, Sean-Ryan CTR (USA) [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B8349167BB194B8DA45DBABDB46684DB-SEAN-RYAN.M]
Sent: Monday, November 30, 2020 3:38 PM
To: Bercik, Lisa M. [lisa.bercik@aptim.com]
Subject: FW: HPNS Draft Final Radiological Scoping Survey Report, Parcel F Structures – Finger Piers
Attachments: CDPH Follow-up comments_11-30-2020_signed.pdf

Lisa,

Please see attached. Let's discuss timelines for the Parcel F projects tomorrow.

SR

From: Bacey, Juanita@DTSC <Juanita.Bacey@dtsc.ca.gov>
Sent: Monday, November 30, 2020 2:34 PM
To: Mccray, Sean-Ryan CTR (USA) <sean-ryan.mccray.ctr@navy.mil>
Cc: Praskins, Wayne <Praskins.Wayne@epa.gov>; Amy Brownell (amy.brownell@sfdph.org) <amy.brownell@sfdph.org>; Stoick, Paul T CIV USN NAVFAC SW SAN CA (USA) <paul.stoick@navy.mil>
Subject: [Non-DoD Source] HPNS Draft Final Radiological Scoping Survey Report, Parcel F Structures – Finger Piers

Hi Sean-Ryan,

Please see attached CDPH's comments on the Draft Final Radiological Scoping Survey Report, Parcel F Structures – Finger Piers.

Nina Bacey, Project Manager
Sr. Environmental Scientist
Site Mitigation and Restoration Program
CA Dept. of Toxic Substances Control
700 Heinz Ave, Berkeley, CA 94710
New Work Cell – (916) 251-8141



SANDRA SHEWRY, MPH, MSW
Acting Director

State of California—Health and Human Services Agency
California Department of Public Health



GAVIN NEWSOM
Governor

DATE: November 30, 2020

TO: Juanita Bacey
Project Manager
Brownfields and Environmental Restoration Program
Department of Toxic Substances Control
700 Heinz Avenue
Berkeley, CA 94710-2721

FROM: Sheetal Singh
Environmental Program Manager
Emergency, Restoration & Waste Management Section
Environmental Management Branch (EMB)
California Department of Public Health (CDPH)
1725 23rd Street, Suite 110
Sacramento, California 95816

SUB: CDPH-EMB review of *Draft Final Radiological Scoping Survey Report Parcel F Structures—Finger Piers*, Hunters Point Naval Shipyard, San Francisco, CA.
Received October 26th, 2020.

As submitted by the California Department of Toxic Substances Control (DTSC), Environmental Management Branch (EMB) of the California Department of Public Health (CDPH) reviewed the *Draft Final Radiological Scoping Survey Report Parcel F Structures—Finger Piers* Hunters Point Naval Shipyard, San Francisco for radiological issues. This review was performed in support of the Interagency Agreement between DTSC and CDPH.

If you need further assistance, please contact Terry Han of my staff at (916) 210-8531 or via email at Terry.Han@cdph.ca.gov.



Activity: Review Response to Comments for *Draft Final Radiological Scoping Survey Report Parcel F Structures—Submarine Pens*, Hunters Point Naval Shipyard, San Francisco, CA. Received October 26, 2020.

November 30, 2020

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The Environmental Management Branch (EMB) of the California Department of Public Health (CDPH) appreciates the opportunity to review response to comments (RTCs), *Draft Final Radiological Scoping Survey Report Parcel F Structures—Submarine Pens*, Hunters Point Naval Shipyard, San Francisco, CA. Received October 26, 2020.

General Comments:

1. Navy's response to CDPH General Comment #2 is not sufficient. CDPH would like Navy to be informed, and acknowledge, that CDPH will not consider the alpha scan survey data presented in this scoping report for any evaluating unrestricted release related to the submarine pens structure in Parcel F, Hunters Point Naval Shipyard. CDPH understands the alpha scan data is to support for the decision to perform additional investigations of the submarine pens and as input to the design of future investigations. However, due to the alpha scan minimum detection concentration (MDC) being higher than the release criteria, CDPH believes the alpha scan sensitivity did not meet the survey objective for the scoping survey and should not be used for any report in the future.

New Comments:

2. To assist our review process, please provide the following information related to the calculation of scan MDC. CDPH understands the difference between observed alpha scan MDC and the expected alpha scan MDC is mostly attributed to the higher background count rates. However, CDPH is unable to replicate the MDC results in Table 4 using the parameters in Table 4, input values listed in section 3.4.4, and the equation listed in section 3.4.4. Please provide:
 - a. the source of the equation listed in section 3.4.4, and
 - b. the detailed steps of calculation for the MDCs in Table 4, including the values for every input parameters of the MDC equation in section 3.4.4. In addition, please provide one example of MDC calculation for alpha surface scan (sequential six-second static counts) on concrete, one example of MDC calculation for beta surface scan on concrete, and one example of MDC calculation for alpha static measurements on concrete.